

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997

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Docket No. R97-1

**SECOND SET OF INTERROGATORIES OF THE ADVERTISING MAIL
MARKETING ASSOCIATION TO USPS WITNESS SMITH
(AMMA/USPS-T-45-3)**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Advertising Mail Marketing Association hereby propounds the attached interrogatories and requests for the production of documents. The instructions contained in our interrogatories to Witness Moeller (AMMA/USPS-T-36-1-3) are incorporated by reference.

If you are unable to provide any of the requested documents or information as to any of the interrogatories, please provide an explanation for each instance in which documents or information cannot be or have not been provided. If the witness to whom this request is directed cannot respond, but another witness can, please redirect the request to that witness.

Respectfully submitted,



Ian D. Volner
N. Frank Wiggins
Counsel to Advertising Mail Marketing
Association

AMMA/USPS-T-45-3


The following questions refer to the responses to AMMA/USPS-T-45-1b and 1c.

- a. Please define capacity and productivity and distinguish between the two as used in your responses.
- b. Please explain why the productivities of DBCS and CSBCS presented USPS-T-29 Appendix I page 43 of 43, appear to have the opposite ordering than the capacity ordering in LR-H-128 page II-2 footnote 2. (i.e., DBCS Productivity < CSBCS Productivity by one to 2.3 while DBCS Capacity > CSBCS Capacity by 3 to one)?

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served this document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

DATE: November 14, 1997



N. Frank Wiggins

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